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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular ("MMC"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission" or "FCC") *Fourth Report and Order* in CC Docket No. 94-102,¹ and the subsequent *Order* in the same proceeding,² hereby files a Quarterly Report for the quarter ending September 30, 2002, detailing its efforts towards attaining digital text telephone ("TTY") accessibility, and the status of the various technological solutions that will help it attain that goal.

In its *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community.³ In order to be assured that the aforementioned deadlines would be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.⁴ MMC has kept the Commission informed as to its progress in achieving TTY-compatibility and, due to MMC's transitioning to a new digital technology, MMC requested waiver of these deadlines until December 31, 2003. In its recently released *Order* in this proceeding, the Commission granted MMC's request for waiver, while requiring MMC to continue to submit Quarterly Reports.⁵ MMC now files this instant report with the Commission.

¹ In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

² In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, 17 FCC Rcd 12084, (rel. June 28, 2002) ("*Order*"). (granting MMC waiver of the rule until December 31, 2003).

³ 47 C.F.R. § 20.18(c).

⁴ See, *Fourth Report and Order* (December 28, 2001).

⁵ See, *Order* (rel. June 28, 2002).

I. Carrier Background

MMC provides analog and digital TDMA CMRS wireless service in the Missouri 7 - Sedalia RSA.⁶ As acknowledged by the Commission in its grant of MMC's request for waiver, compliance with the Commission's June 30, 2002 deadline was impractical.

II. Access to 911 Through TTY Devices

A. Development Activities

In the previous quarters, while Commission action on its waiver request was pending, MMC replaced its switch processors and obtained the necessary switch hardware upgrades to enable it to migrate to MTX10, the minimum software load necessary to deploy the TDMA feature-specific TTY compatibility software, and other FCC-mandated capabilities. During the third quarter, MMC continued to investigate alternate digital technologies for deployment by December 31, 2003.

During the third quarter of 2002, MMC contacted the Commission's Consumer & Governmental Affairs Bureau, to help "ensure that [MMC's] subscribers are informed of its waiver until December 31, 2003."⁷ MMC contacted the Bureau per the Commission's suggestion made to all carriers receiving waivers, despite the fact that MMC is not aware of any existing customer that uses a TTY device on its analog network or expressed a desire to utilize such devices on either its analog or digital network. MMC was included on the Commission's list of carriers who received waiver from 47 C.F.R. 20.18(c), posted on the Consumer & Governmental Affairs Bureau's website.⁸

B. Testing and Deployment Activities

No testing or deployment activities were undertaken during the third quarter.

III. Conclusion

MMC has been granted a waiver of the Commission's June 30, 2002 deadline for compliance with 47 C.F.R. 20.18(c), until December 31, 2003. Because of the announced abandonment of TDMA by MMC's roaming partners, MMC is preparing to migrate its network to an alternate digital technology that will not only meet the TTY-compatibility requirements but will also be capable of meeting the other FCC-mandated capabilities. When MMC makes its migration to a new digital technology, MMC will deploy that technology in a mode fully compatible with TTY devices. As required, under the Commission's recent *Order*, MMC will

⁶ Station KNKN595 (CMA510B) and KNKR207 (CMA024B-2).

⁷ See, *Order*, at ¶ 25.

⁸ See, <http://www.fcc.gov/cgb/dro/e911tty.html> (last visited September 30, 2002).

provide the Commission with quarterly updates on the status of development and deployment, as advised by MMC's infrastructure and handset vendors.

Respectfully Submitted,

Missouri RSA No. 7 Limited Partnership d/b/a
Mid Missouri Cellular

Dated: October 11, 2002

/s/ Anna E. Ward

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Its Attorneys

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CERTIFICATE OF SERVICE

I, Ruth E. Garavalia, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 11th day of October 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/s/ Ruth E. Garavalia
Ruth E. Garavalia